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February 14, 2011

Received & Inspected

FEB 18 2011

FCC Mail Room

To: Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, DC 20554

(Original plus four copies)

Federal Communications Commission  
Enforcement Bureau  
Telecommunications Consumers Division  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

(Two copies)

Best Copy and Printing, Inc.  
445 12<sup>th</sup> Street  
Suite CY-B402  
Washington, DC 20554

(One copy)

In re: Annual 47 C.F.R. 64.2009(e) CPNI Certification  
EB Docket No. 06-36

Attached please see the above-referenced certification for Westside Independent Telephone Company for 2010.

Sincerely,

WESTSIDE INDEPENDENT TELEPHONE COMPANY

Megan Badding  
Marketing/Sales/CS Manager

Enclosures

No. of Copies rec'd 0+4  
List A B C D E

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Received & Inspected

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FCC Mail Room

Annual 64.2009(e) CPNI Certification for 2010.

Date filed: February 14, 2011

Name of company covered by this certification: Westside Independent Telephone Company.

Form 499 Filer ID: 801666

Name of signatory: Megan Badding

Title of signatory: CSR/Sales/Marketing Manager

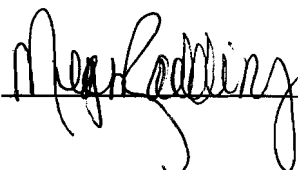
I, Megan Badding, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules. See attached accompanying statement of operating procedures.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company currently has no information with respect to the processes pretexters are using to attempt to access CPNI. At this time, we have not encountered known pretexting. Our protective measures against pretexters are outlined in the accompanying statement of operating procedures.

Signed:  \_\_\_\_\_

### **Attachment: Accompanying Statement of Operating Procedures**

Per the FCC CPNI rules [47 CFR §64.2009(e)] and as referenced in the attached signed certification, Westside Independent Telephone Company herein referenced as the Company hereby certifies that the Company [and its affiliates] is in compliance with the FCC CPNI rules and has outlined some of the important operating procedures below in order to ensure the Company's compliance in the protection of CPNI:

1. CPNI file has been updated in order to account for all FCC CPNI rules, including the recent revisions, and has been adopted by our Company.
2. CPNI Compliance officer has been designated to oversee all CPNI duties, training, and activity
  - a. Established an outbound marketing supervisory review process for the use of CPNI
  - b. Records are maintained for any marketing campaigns that utilize customers' CPNI for a minimum of one year
3. Employees have been trained on when they are, and are not, authorized to use or disclose CPNI
  - a. Disciplinary process has been defined and is in place for violations and/or breaches of CPNI
4. Carrier authentication requirements have been met
  - a. All customer during a customer-initiated telephone call are authenticated as being an authorized account contact before discussing CPNI (non-call detail)
  - b. Call detail is only released to customers during customer-initiated telephone contact only by the following FCC approved methods for the release of the requested call detail: Westside Independent Telephone Co. does not use password method.
    - i. Sending the requested detail to the address of record (only a physical or email address associated with that particular account that has been in our company files for at least 30 days)
    - ii. Calling the customer back at the telephone of record (only disclosing if the customer was authenticated as being an authorized account contact)
    - iii. Having customer come in to Company's office and provide a valid government issued photo ID
5. Notice to customer of account change as customers are notified immediately when a customer creates or changes one of the following:
  - a. authorized user
  - b. address of record
  - c. customer response to a back-up means of authentication
6. Notice of unauthorized disclosure of CPNI, a notification process is in place in order to notify both law enforcement and customer(s) in the event of a CPNI breach within the timeline specified by the FCC
7. Opt-out method for approval of CPNI use for marketing campaigns is utilized
  - a. Customers are notified annually of their rights for the use of their CPNI in marketing campaigns
  - b. New customers are notified of the opt-out procedure as a part of the customer sign-up process
  - c. Billing system displays customer's opting status
  - d. Compliance officer retains CPNI notifications and opting records for at least two years
8. Additional protection measures are taken above and beyond the current FCC CPNI rules
  - a. Company takes reasonable measures to discover and protect against activity that is indicative of pretexting
  - b. Company maintains security of all CPNI, including but not limited to:
    - i. Documents containing CPNI are shredded



**Westside Independent Telephone Company  
d/b/a Western Iowa Networks**

Policy and Procedures Governing  
Customer Proprietary Network Information

## **Introduction**

### **Statement of Company Policy-**

Under applicable federal and state laws, Westside Independent Telephone Company d/b/a Western Iowa Networks, (the “Company”) has a duty to protect the confidentiality and proprietary information of, and relating to, customers, other telecommunication carriers, and equipment manufacturers. To ensure full compliance with these laws and regulations, including, specifically, the rules of the Federal Communications Commission governing customer proprietary network information (“CPNI”), this Manual sets forth in detail the policy and procedures of Westside Independent Telephone Company d/b/a Western Iowa Networks governing the use, disclosure, and provision of access to such proprietary information.

### **Statement of Company Policy**

\*\*\* Each employee of the Company is required to protect the confidentiality of Customer Proprietary Network Information (CPNI) and, shall comply with all policies and procedures set forth in this Manual.

\*\*\* Any violation of or departure from the policies and procedures set forth in this Manual shall be reported to the Company’s CPNI Compliance Officer.

\*\*\* Any failure to comply with the policies and procedures set forth in this Manual shall result in disciplinary action including, but not limited to, suspension and/or termination of employment.



**The policies and procedures set forth in this manual apply to all Employees,  
Officers, and Board Members of  
Westside Independent Telephone Company d/b/a Western Iowa Networks.**

1. **Definition CPNI-** Customer Proprietary Network Information
  - A. Includes personally identifiable information derived from a customer's relationship with a wireline or wireless telephone company. Every telecommunications carrier has the duty to protect the confidentiality of its customers' CPNI.
  - B. Information contained in the billings pertaining to telephone exchange service or telephone toll service received by a customer of a carrier. CPNI includes highly-sensitive personal information such as phone numbers called by a consumer; the frequency, duration, and timing of such calls, and any services purchased by the consumer, such as call waiting.
2. **Account Information-** Account information that is specifically connected to the customer's services relationship with the carrier, including such things as an account number or any component thereof, the telephone number associated with the account, or the bill's amount.
3. **Address of Record-** An address of record whether postal or electronic, is an address that the carrier has associated with the customer's account for at least 30 days.
4. **Call Detail Information-** Any information that pertains to the transmission of specific telephone calls, including, for outbound calls, the number called, and the time, location, or duration of any call and, for inbound calls, the number from which the call was placed, and the time, location, and duration of any call.
5. **Telephone number of record-** The telephone number associated with the underlying service, not the telephone number supplied as a customer's "contact information"
6. **Valid Photo ID-** A valid photo id is government- issued means of personal identification with photograph such as drivers license, passport, or comparable ID that is not expired.



### **Confidentiality of CPNI**

1. The company may only use, disclose, or permit access to individually identifiable CPNI-
  - a. as required by law
  - b. with the approval of the customer; or
  - c. in providing the telecommunication service from which the CPNI is derived or in providing services necessary to, or used in, providing such telecommunications service.
2. Disclosure upon Request by customers. The company shall disclose CPNI, upon affirmative written request by the customer, to any person designated by the customer.

### **Conduct Expressly prohibited by the Company**

1. The following are expressly prohibited by the Company:
  - a. Sale or possession of CPNI
  - b. Use of CPNI to track customers' use of competitors' services`
2. Any violation of this section shall be grounds for immediate termination of employment and, as applicable, referral to federal and/or state law enforcement authorities for further action. The Company may, however, in its discretion take alternative disciplinary action against any employee, officer, or board member of the Company found to have violated this section.

### **Permitted uses and Disclosures of CPNI**

1. The company may use CPNI obtained from its customers, either directly or indirectly through its agents.
  - a. To initiate, render, bill and collect for telecommunications services.
  - b. To provide marketing, in compliance with FCC guidelines
  - c. To protect the rights or property of the Company, or to protect users and other carriers from fraudulent or illegal use of or subscription to, such services.
  - d. For provision of information services
  - e. In its provision of maintenance and repair services



## **Company Policies and Procedures**

1. **Unauthorized Use of CPNI-** The Company regards any unauthorized or improper use, disclosure or access to CPNI as a serious offense, and will take appropriate disciplinary action, which may include suspension and/or termination of employment.
2. **Customer Request for CPNI-**
  - a. CPNI may be disclosed only to the customer or a third party designated by the customer to receive the customer's CPNI. The Company requires all employees to ensure that the person requesting CPNI is authorized to receive such CPNI. The Company requires authentication of a customer's identification prior to the release of CPNI on customer initiated telephone contacts or in-store visit.
  - b. The Company will disclose call detail on a customer initiated call only by sending the call detail to an address of record, calling the customer at the telephone or record, or if customer brings in a valid ID into one of our locations.
  - c. If the customer is able to provide call detail information to the Company's employee during a customer-initiated call without the Company employee's assistance then the employee is permitted to discuss the call detail information provided by the customer.
  - d. The Company will disclose non-call detail CPNI on a customer-initiated call if the customer provides identity authentication. Identity authentication may include last four of social security number, address, and telephone number.
3. **Notice to Customers of Account Change-** The Company will notify the customer immediately when the following are created or changes (1) back up or forgotten passwords (2) the address of record (3) adding additional users to account.
4. **Records of Disclosure of CPNI-** The Company shall maintain a record of its own or any affiliates sales and marketing campaigns (if any) that use their customer's CPNI. The Company's Sales and Marketing Manager is responsible for maintaining this record, which shall include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. This record shall be kept for a minimum of one year.



5. **Duty to report violation or departure from CPNI Policies and Procedures Manual-** Each employee, officer, or board member of the Company has an affirmative duty to ensure compliance by the Company of the requirements under federal and state law governing the use of CPNI. Any employee, officer, or board member of the Company who knows of or has reason to believe that a violation of or departure from the policies and procedures set forth in this Manual has occurred or will occur shall immediately notify your immediate Manager, Executive Officers, or CEO, or any member of the Board of Directors if the CEO is the subject of the suspected violation.
6. **Notice to Law Enforcement of Unauthorized Disclosure of CPNI-** The Company must notify law enforcement of a breach of its customer's CPNI no later than seven business days after a reasonable determination of a breach by sending electronic notification through a central reporting facility to the United States Secret Service (USSS) and the Federal Bureau of Investigation. The Company will not notify customers or disclose the breach to the public until 7 full days have passed after the notification to the USSS and the FBI except as provided in FCC guidelines. The Company will maintain a record of breaches discovered, notifications made to the USSS and the FBI and notifications made to customers. The record will include, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach and the circumstances of the breach. The record must be retained for 2 years.
7. **Employee annual certification/training-**All employees of the Company shall be given a copy of this Manual. All employees are required annually to review the manual and to certify in writing that he or she understands and will adhere to the policies and procedures in this manual.
8. **Annual Certificate of Compliance-** The Company's Officer of Compliance shall annually sign a CPNI compliance certificate stating that the officer has personal knowledge that the Company has established policies and procedures that are adequate to ensure compliance with the FCC's CPNI rules.

## **Customer Proprietary Network Information (CPNI) Rules and Training**

### **Employee Acknowledgement:**

I understand that if Breda Telephone Corp., Prairie Telephone Co., Inc., BTC, Inc., or Westside Independent Telephone Company determines that I have violated the CPNI rules, I may be subject to disciplinary action up to and including termination of employment. I understand and agree to comply with the CPNI rules in all respects, and I will contact my Department Manager if I have questions regarding these rules.

I acknowledge that I have received CPNI training and received a copy of the manual on Policies and Procedures Governing Customer Proprietary Network Information ("Manual"). I understand the content of the training and the manual. I understand and agree to comply with all aspects of the training and manual, and I will contact my Department Manager if I have questions regarding the training or the manual.

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Printed Name of Employee

### Training CPNI 2010

1. February 26<sup>th</sup>, 2010- Staff meeting was held and we had our annual CPNI training. Compliance Officer, Megan Badding handed out our CPNI manuals and trained staff with our company's policies and procedures governing CPNI. Staff was given an acknowledgement that they were trained and fully understands CPNI. These forms were turned back into our HR department and kept on file.

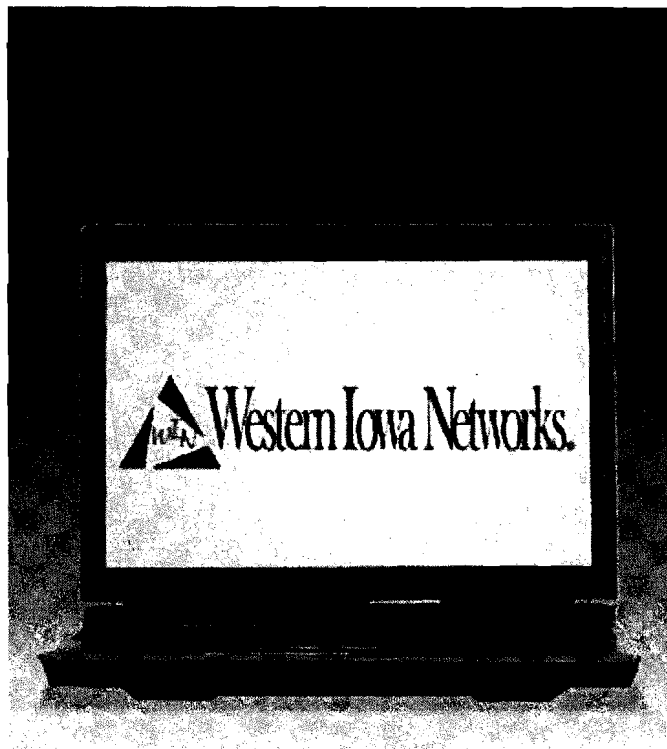
EMPLOYEE LIST - WESTERN IOWA NETWORKS

Signed CPNI Acknowledgement Form for 2010

MEGAN BADDING  
KEVIN BATCHER  
JOHN BEITER  
RYAN BORKOWSKI  
HOLLY DARVEAU  
CHUCK DEISBECK  
TERRY DICKINSON  
DOUG EHLERS  
BRIAN HAMACHER  
MISSY HENDRICKS  
JODI IRLBECK  
SOPHIA KOCH  
DELYNNE KROEGER  
JULIE LAMAACK  
DAWN LOEW  
MIKE LUDWIG  
SUE MARTIN  
DIANE MILLER  
JANE MORLOK  
RICK MORRIS  
CHRIS NIELAND  
BRIAN POTTEBAUM  
JENNIFER PUDENZ  
MISSY SANDER  
GRANT SIEBRECHT  
KEVIN SKINNER  
JAN STEINKAMP  
STEPHANIE THOMSEN  
BRUCE TYSOR  
STEVE UHLENKAMP  
JEANNIE WOOD

### Notification to our Customers 2010

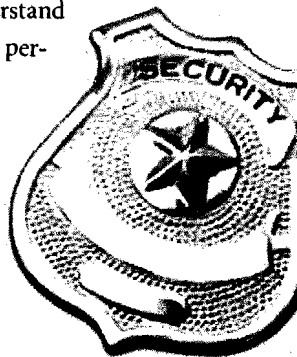
1. February 2010- Opt out notifications were sent to all our customers. We put our 800 number and an email address if customers wanted to opt out. If we are notified that a customer would like to opt out we will set an alert in our operating system. When CSR pulls that customer's account up an alert will pop up stating "Do Not Market" Insert attached.



## Rest Assured, WIN Safeguards Your Account Privacy

Customer Proprietary Network Information (CPNI) includes account information such as the long distance carrier you have chosen, calling features you use, and any calling plans to which you may be subscribed. We understand the importance you place on personal privacy. That's why Western Iowa Networks (WIN) keeps all customer account information strictly confidential to the fullest extent possible, and uses

- industry-accepted technology to safeguard this data.



Special Notice of Your Rights Regarding

# Customer Account Information

**Who uses this information and is it protected?**

Only WIN can see or use your Customer Proprietary Network Information (CPNI). It is never released to outside companies. You have the right, and we have the duty under federal law, to protect the confidentiality of this type of information.

**What do I need to do?**

No action on your part is necessary unless you wish to restrict WIN's use of this information to contact you for the purpose of tailoring our service offerings to better meet your needs. Should you wish to restrict use of your CPNI, please call us at 888-508-2946 or send an e-mail to [cpnidata@westianet.com](mailto:cpnidata@westianet.com) with your request within 30 days of receipt of this notice. Your denial for use of CPNI will remain valid until you tell us otherwise. Keep in mind that restricting CPNI may make you ineligible to receive some information from WIN about new products and services, promotions and packaged offerings.

**If I restrict use of my CPNI, will it affect the WIN services I receive?**

No, your CPNI decision will not affect the provision of any services to which you subscribe. You will also still receive monthly bill inserts, quarterly newsletters and other publications that are sent to all customers.

*This reminder brought to you by:*

